

14
5-16-02
SC

ORIGINAL

Stock w/ J

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LINDA F. WAEBER
Plaintiff

: CIVIL ACTION NO. 1:01-CV-856

:

:

v. : JUDGE RAMBO

:

:

HERSHEY FOODS CORP.,
Defendant

: JURY TRIAL DEMANDED

FILED
HARRISBURG, PA

MAY 15 2002

MARY E. D'ANDREA, CLERK
Per _____ Deputy Clerk

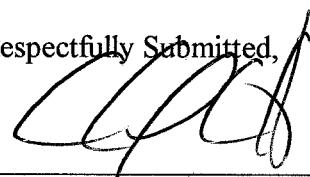
MOTION FOR ENLARGEMENT OF TIME

AND NOW, comes Plaintiff, through her attorney Andrew J. Ostrowski, Esquire, and in support of her Motion for Enlargement of Time, aver as follows:

1. Defendant filed its Motion for Summary Judgment on April 30, 2002, and Plaintiff's response is due on May 15, 2002.
2. Plaintiff's Counsel has been attempting to contact Plaintiff by telephone and mail since receiving Defendant's Motion in order to discuss the merits of her case and prepare her response, but has not received a reply and has not completed Plaintiff's response to Defendant's Motion.
3. Plaintiff submits that additional time is warranted under the circumstances in order to allow her a full and complete opportunity to respond to defendant's Motion for Summary Judgment.

WHEREFORE, Plaintiff respectfully requests that this Court enter an appropriate order granting an enlargement, until May 24, 2002, within which to respond to Defendant's Motion for summary Judgment

Respectfully Submitted,



Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: May 15, 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LINDA F. WAEBER
Plaintiff

v.

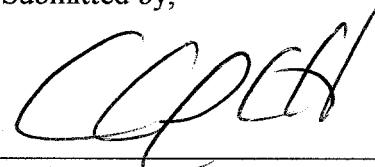
HERSHEY FOODS CORP.,
Defendant

: CIVIL ACTION NO. 1:01-CV-856
:
:
:
: JUDGE RAMBO
:
:
: JURY TRIAL DEMANDED

CERTIFICATE OF CONCURRENCE/NON-CONCURRENCE

I, Andrew J. Ostrowski, certify that I have contacted Counsel for Defendant and that Counsel concurs in the foregoing Motion only to the extent of granting Plaintiff leave until May 20, 2002 within which to file her response. Due, however, to Counsel having a Third Circuit brief due on May 20, 2002, and depositions scheduled for May 21 and 22, Plaintiff seeks additional time in which defendant does not concur.

Submitted by,



Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: May 15, 2002

CERTIFICATE OF SERVICE

I, Andrew J. Ostrowski, certify that service of the foregoing is being made, by first-class mail, upon Defendant, addressed as follows:

Brian Jackson, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17108-1166

by,



Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: May 15, 2002